

SGA CROSBY LLC's FCI
FCI-24615
10/11/2022 06:12 PM
IO{(b)(6)}, Houston VI (IO) Field Office

GENERAL INFORMATION

IOI Hours Spent on Inspection
509.0
Due Date
7/30/21 1:00 AM

LICENSEE INFORMATION

Licensee Name	RDS Key	License/Permit Number	License Type
SGA CROSBY LLC	5-76-05566	5-76-201-01-3E-05566	01 - Dealer License

Business Type
Limited Liability Company (LLC)

Premises Ownership Type	Premises Address
Leased/Rented	5911 FM 2100, Unit N/A, CROSBY, Texas 77532

Premises Location Type Required
Store Front

Address
5911 FM 2100
Unit N/A
CROSBY, Texas 77532
HARRIS
United States

Address
5911 FM 2100
Unit N/A
CROSBY, Texas 77532
HARRIS
United States

Phone Type	Phone Number	Remarks
Business	+1 281-328-2800	

Email Address	Email Remarks
(b)(6)	

Online Presence Type	Online Presence URL	Remarks
Website	springgunsandammo.com	

RECOMMENDATIONS

Final Decision Date
Revocation 09/06/2022

Details

On 06/14/2022, ATF issued a Notice to Revoke the license of SGA Crosby pursuant to 27 CFR 478.73(a). Subsequent to the notice, SGA Crosby initially requested a hearing on that Notice. However, SGA Crosby officially withdrew its request for a hearing in writing and voluntarily surrendered the license, effective 09/30/2022. As such, there was not a timely request for a hearing in place and on 09/06/2022, SGA Crosby was issued a final notice of suspension or revocation and/or imposition of civil fine effective 09/30/2022. On 10/05/2022, notification was provided the FFLC of the Final Notice of Denial of Application, Revocation, Suspension and/or Fine of Firearms License for SGA Crosby LLC, FFL# 5-76-05566.

The licensee advised they will submit the records to the Federal Licensing Center for processing within 30 days of 09/30/2022.

Out of Business Records and Inventory Management

Licensee Records

Licensee Inventory

Deputy Assistant Director - Industry Operations Curtis Gilber{(b)(6)} Recommendation
Revocation

Details

Per the DOJ Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety, the inspection meets revocation.

I concur with the DIOs recommendation for revocation.

Division Counsel (b)(6) Review

Details

Reviewed

Director of Industry Operations Tanarra James's Recommendation
Revocation

Details

During this inspection, there were 15 violations cited. Three violations warrant a recommendation of revocation for failure to conduct a NICS check in seven instances, failure to execute a Form 4473 in instance, an unlawful sale or delivery of a firearm to a prohibited person in instance and making a false entry, omitting entry or failing to properly maintain required record keeping on Form 4473 in instances. A background check was conducted on the customers for which a NICS was not conducted and the customers are not prohibited under the GCA. A background check was conducted on the customer suspected of being a prohibited person and it was determined he is not legally in the United States and appears to be subject to removal. Further investigation revealed (b)(6). There were no extraordinary circumstances provided as an explanation for the violations warranting revocation; therefore, based on the Administration's Strategy to Prevent and Respond to Gun Crime and the current Administrative Action Policy, a recommendation of revocation is proposed.

Area Supervisor (b)(6) Recommendation
Revocation

Details

Concur with the recommendation of Revocation. This is the licensee's first inspection. During the inspection, fifteen violations were cited, including violations for failing to conduct a NICS background check, transferring a firearm to a prohibited person, and making false entries in required records. The licensee had failed to conduct NICS criminal background checks on several transfers of firearms to non-licensees who had (b)(3)(26 USC § 6103) firearm along with a firearm as defined under the Gun Control Act. The licensee also failed to conduct a NICS criminal background check on an individual after they had completed and certified Section B of the ATF Form 4473. In this instance, a NICS Transaction Number (NTN), that was obtained prior to the non-licensee completing and certifying Section B, was listed on the ATF Form 4473 and the printout from the e-NICS query relating to the NTN was attached to the form and the NTN was recorded on the ATF Form 4473. Therefore the required NICS check was not conducted as required by the regulation. The licensee also transferred a firearm to an individual who indicated they were in the United States on a VISA, but the licensee failed to obtain a valid exception and notate it on the ATF Form 4473. The person was found to be illegally in the United States which was established by information provided by Immigration and Customs Enforcement (ICE). The licensee also entered false information in required records in that information entered for a transaction or transactions for firearms, all record the transactions occurred on different dates. The non-licensee to whom the licensee transferred the firearms is also the individual in which a NICS background check was not conducted after the non-licensee completed and certified Section B and that the NTN entered on the ATF Form 4473 is for a query that was made several days prior to the person signing the ATF Form 4473. Based on the information found during the inspection, the violations cited warrant Revocation and therefore a recommendation of Revocation is made.

Industry Operations Investigator (b)(6) Recommendation
Revocation

Details

The Recommendation is Revocation.

IO (b)(6) issued 15 violations because of this inspection. Three violations resulted in the recommendation of revocation.

27 CFR 478.99(c):

Unlawful sale or delivery of a firearm to a prohibited person instance. (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

27 CFR 478.121(c):

Making false entry, omitting entry, or failing to properly maintain required recordkeeping instance. (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

27 CFR 478.102(a):

Failure to complete a NICS/POC background check (seven instances). ATF Forms 4473.

NICS Violation: (b)(6)
NICS Violation:
NICS Violation:
NICS Violation:
NICS Violation:
NICS Violation:
NICS Violation:

Inspection Findings

Records and Forms

- 9. Failure to execute a Form 4473 (Exception: Select findings 6, 7, and 8 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons; if the transferee is NOT prohibited).
- 13. Falsify records required under the GCA or making a false or fictitious written statement in the FFL's required records or in applying for a firearms license.

Transfer of Firearm

4. Transfer of a firearm to a prohibited person while knowing or having reasonable cause to believe that the transferee is a prohibited person.

Firearms

1. Missing firearms after inventory reconciliation (e.g., no records of disposition, required or otherwise).

NICS

4. Failure to conduct a NICS check or obtain an alternate permit (Exception: Select findings 1, 2, and 3 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons if the transferee is NOT prohibited).

Failure to Report

1. Failure to file Reports of Multiple Sale or Other Disposition of Pistols and Revolvers (F 3310.4) or Reports of Multiple Sales or Dispositions of Certain Rifles (F 3310.12) (Southwest Border states only) when legally required and with a minimum of 4 instances.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
SGA CROSBY LLC	Limited Liability Company (LLC)	Yes

Additional Findings

According to the Texas Secretary of State, SGA -Crosby, LLC is a Domestic Limited Liability Company (LLC), which has been in existence since January 25, 2017. Mr. Chris Rhodes is the only Director/Member.

Mr. Christopher Rhodes provided a letter, which states as of the date the audit began he was the only person with 100% ownership of SGA Crosby, LLC. The letter further states that as of September 28, 2021, ownership of the company and control of the FFL has been transferred/changed to C. David Rhodes (Mr. Christopher D. Rhodes son) at 100% ownership and his title is President/Managing Member.

Mr. Christopher Rhodes provided a letter, which was sent to ATF Federal Firearms Licensing Center informing ATF that SGA Crosby, LLC had a change in control as of June 18, 2021, for 100% of the current stock of the entity transferred from Christopher Rhodes to Christopher David Rhodes.

(b)(6) provided an email from (b)(6), ATF Legal Instrument Examiner, which stated (b)(6) has updated the file to reflect the change in control and instructed the FFL to submit a new form 7 before the expiration of the current FFL.

IO (b)(6) sent an email to (b)(6) requesting her to inform Mr. C. David Rhodes that he needs to submit a Certificate of Amendment to the Texas Secretary of State informing them about the change of ownership and control for SGA Crosby, LLC.

According to the Texas Office of The Comptroller, SGA -Crosby, LLC has an active franchise tax and Sales Tax and Use Permit.

Attachment(s):

- FLS.pdf
- ATF Notice of Change of Control.pdf
- FLS 9-28-2021.pdf
- SGA Crosby, LLC Ownership.pdf
- SOS Certificate of Formation.pdf
- Franchise Search Results.pdf
- SOS Management.pdf
- Sales Tax.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Leased/Rented	Store Front	Yes

Address

5911 FM 2100
Unit N/A
CROSBY, Texas 77532
HARRIS
United States

Additional Findings

According to Harris County Appraisal District, Lake Houston Sporting Industries, Inc. owns the premises.

Attachment(s):

- Harris County Appraisal District (Lake Houston Sporting Industries Inc).pdf

Trade Name/DBA Verification

Trade Name/DBA	Is the trade name/DBA registered?
SPRING GUNS & AMMO - CROSBY	Yes

Additional Findings

According to the Texas Secretary of State, the licensee operates under the trade name Spring Guns & Ammo - Crosby

Attachment(s):

SOS Assumed Name Certificate.pdf

SOS Assumed Name Certificate Query.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?

Yes

Additional Findings

The applicant provided the lease agreement, which includes permission to sell firearms on the premises.

Attachment(s):

Lease Agreement.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?

Yes

Additional Findings

According to Harris County, there are no zoning regulations.

Attachment(s):

Harris County Zoning Letter 2022.pdf

APPOINTMENT DETAILS

Interview Date

03/18/2021

Address

5911 FM 2100, Unit N/A, CROSBY, Texas 77532

Responsible Attendee(s)

Non-Responsible Person(s)

CHRISTOPHER DAVID RHODES

No Items

RANDILYNN CARI REEL

CHRISTOPHER DAVID RHODES Jr.

RYAN JAMES SKAR Jr.

RESPONSIBLE PERSON(S)

CHRISTOPHER DAVID RHODES

Name	Gender	Race	Ethnicity
CHRISTOPHER DAVID RHODES	Male	White	Not Hispanic or Not Latino
Date of Birth (b)(6)	SSN (b)(6)	Job Title MEMBER	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
(b)(6)	(b)(6)	(b)(6)	(b)(6)

Place of Birth

Country	State	City
United States Of America	(b)(6)	

Home Address

(b)(6)

United States

Additional Names

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	Texas	(b)(6)

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	
(b)(6)	
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
03/08/2021

Criminal History Check Comments
According to Omnixx Force/NCIC there are no prohibiting factors on the responsible person.

RANDILYNN CARI REEL

Name	Gender	Race	Ethnicity
RANDILYNN CARI REEL	Female	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	DIRECTOR	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
(b)(6)	(b)(6)	(b)(6)	(b)(6)

Place of Birth

Country	State	City
United States Of America	(b)(6)	(b)(6)

Home Address

(b)(6)

Additional Names

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	Texas	(b)(6)

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
03/08/2021

Criminal History Check Comments
According to Omnixx Force/NCIC there are no prohibiting factors on the responsible person.

CHRISTOPHER DAVID RHODES Jr.

Name	Gender	Race	Ethnicity
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CHRISTOPHER DAVID RHODES Jr.

Male

White

Not Hispanic or Not Latino

Date of Birth
(b)(6)

SSN
(b)(6)

Job Title
VP

Physical Identifiers

Height
(b)(6)

Weight
(b)(6)

Hair Color
(b)(6)

Eye Color
(b)(6)

Place of Birth

Country
United States Of America

State
(b)(6)

City
(b)(6)

Home Address

(b)(6)

United States

Additional Names

Citizenship

United States

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
03/08/2021

Criminal History Check Comments
According to Omnixx Force/NCIC there are no prohibiting factors on the responsible person.

RYAN JAMES SKAR Jr.

Name	Gender	Race	Ethnicity
RYAN JAMES SKAR Jr.	Male	White	Not Hispanic or Not Latino

Date of Birth
(b)(6)

SSN
(b)(6)

Job Title
MGR

Physical Identifiers

Height
(b)(6)

Weight
(b)(6)

Hair Color
(b)(6)

Eye Color
(b)(6)

Place of Birth

Country
United States Of America

State
(b)(6)

City
(b)(6)

Home Address

(b)(6)

Additional Names

Citizenship

United States

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
03/08/2021

Criminal History Check Comments
According to Omnixx Force/NCIC there are no prohibiting factors on the responsible person.

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
Ms. Reel stated the firearms business and firearms inventory were acquired from the Federal Firearms Licensee (FFL) 5 Point Firearms dba High Noon Indoor Gun Range on May 1, 2017.

The licensee sells and transfers new and used hand guns and long guns to the general public.
The licensee sells and transfers (b)(3)(26 USC § 6103) the general public.
The licensee operates a shooting range on the premises.
The licensee sells firearms accessories on the premises.
The licensee offers firearms training classes on the premises. The licensee allows other organizations to conduct firearms training classes in the classroom.
The licensee sells firearms on the internet website springgunsandammo.com.
The licensee does not engage in gunsmithing and firearms consignments.
The licensee sells firearms at Gun Shows.

Mr. Christopher David Rhodes also has an ownership interest in the following businesses:

Bayou Arms, Inc. dba Spring Guns & Ammo (FFL # 5-76-04309)
IIA-SGA, Inc. dba Spring Guns And Ammo II (FFL # 5-76- 04080)

Mr. Christopher David Rhodes, Jr. has an ownership interest in the Law Office of C. David Rhodes, PLLC. Ms. Reel stated she is an employee of the law firm.

Responsible Persons Randi Reel and James Ryan Skar do not have any ownership interest in the business.

The licensee has an active Sales Tax.

All Responsible Persons and (b)(6) (Manager) have keys to the premises, locked 4473s and (b)(3)(26 USC § 6103)

Do they need an additional license or permit?
No

Who are their primary suppliers?
The primary firearms suppliers are (b)(4).

Ms. Reel stated majority of the firearms inventory is acquired from (b)(4)

Other State or Local Permits

Type	Number	Expiration
State Sales Tax	(b)(3)(26 USC § 6103)	

Business Activities

- (b)(3)(26 USC § 6103)
- Internet Sales/Transfers
- Retail
- Gun Show Participant
- Law Enforcement Sales

Selected Operational Security Measures

- Controlled Access to ATF Recordkeeping
- Controlled Access to Keys
- Current & Active Security Plan
- Formal Employee Training
- Suspicious persons/activities reporting protocols

Internet Sales/Transfers Website

springgunsandammo.com

SUPPLEMENTAL QUESTIONNAIRE

General Business Operations

If there is a security system, who has access to the security codes?
Ms. Reel stated the licensee has a security system (ADT). All the FFL Responsible persons and (b)(6) have the security codes.

Who has keys to the premises?
Ms. Reel stated all the FFL Responsible persons and (b)(6) have keys to the premises.

Who has keys to locked inventory?
Ms. Reel stated all the FFL Responsible persons and (b)(6) have keys to the locked inventory.

Who is operating the business on a day-to-day basis?

Ms. Reel stated she operates the business on a daily basis.

Is financial backing provided by anyone that is not a responsible person on the license/permit?

Ms. Reel stated there is no financial backing provided by anyone, except Mr. C. David Rhodes for the license.

Are any employees known to be prohibited?

Ms. Reel stated there are no prohibited employees.

Are any employees associated with a previously denied/revoked/surrendered license/permit?

Ms. Reel stated there are no employees associated with previously denied/revoked/surrendered licenses/permits.

SECURITY WALKTHROUGH

Inspection Area Description

The premises are located in a stand alone commercial storefront in a suburb area. The storefront has a sales floor, a classroom and a shooting range.

(b)(4)

Primary Activity

Retail

GPS Coordinates

Latitude

29.91250

Longitude

-95.06994

Selected Physical Security Measures

Alarm Monitoring (with Cellular Back-Up)

Concrete Balusters or Other Barrier in front of location

Floodlights

Glass Breakage Detection

Local Audible Alarm

Locked Gates

Deadbolts

Motion Sensors

Pull Down Gates

Reinforced Heavy Duty Doors/Frames

Security Cameras

Window Film/Tinting/Mirroring

Safe(s)/Vault(s)

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF F 4473 Reviewed

Total Number of Open Dispositions in A & D Record

Total Number of Firearms in Inventory

581

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation

Total Number of Acquisitions in the Last 12 Months

(b)(4)

Total Number of Dispositions in the Last 12 Months

(b)(4)

Onsite Start Date

Onsite End Date

Number of Reported Lost/Stolen Firearms During Inspection Period

Total Number of Traces During Inspection Review Period

Total Number of Those Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

[Click Here to See List of Perfected Traces](#)

(b)(3)(26 USC § 6103)

(b)(3)(26 USC § 6103)

Additional Comments

The following IOIs and Supervisor assisted with the firearms compliance inspection:

IOI (b)(6)

IOI (b)(6)

IOI (b)(6)

IOI (b)(6)

Supervisor (b)(6)

The licensee originally received the Federal Firearms License on April 5, 2017. The FLS split-out was reviewed with the licensee for accuracy. The period of inspection was from March 18, 2020 to March 18, 2021.

The licensee sells and transfers new and used handguns and long guns to the general public (b)(3)(26 USC § 6103)
(b)(3)(26 USC § 6103) The licensee operates a gun range from the premises and rents GCA and (b)(3)(26 USC § 6103) firearms to the general public.

April 5, 2017 to June 2019, the licensee managed the A&D Records with the Celerant Computerized A&D Records system. June 2019 to present the licensee manages the A&D Records with the Axis Computerized A&D Record system. Both A&D Records systems are in compliance with ATF Ruling 2016-1. The licensee manages the following A&D records in the Axis Computerized A&D Record System.

Axis Non NFA A&D Record
(b)(3)(26 USC § 6103)

The licensee's computer server is located on the premises and is cloud based.

The GCA and (b)(3)(26 USC § 6103) A&D Records were in the proper format. The entries were not made timely and accurately. The licensee had firearms acquisitions and dispositions discrepancies (See ATF Report of Violations). After reconciliation the licensee had 581 (331 GCA and (b)(3)(26 USC § 6103) firearms in inventory and (b)(3)(26 USC § 6103) GCA and (b)(3)(26 USC § 6103) firearms open entries. The licensee submitted a theft/loss report for (b)(3)(112 Public Law 55 125 Stat 552) missing firearms during the compliance inspection. ATF received the theft/loss reports (b)(3)(112 Public Law 55 125 Stat 552) fire arm was discovered as missing during transit from (b)(3)(112 Public Law 55 125 Stat 552) ATF received the interstate theft/loss report for missing firearm serial number (b)(3)(112 Public Law 55 125 Stat 552)

IOI (b)(6) made numerous request of Ms. Reel (responsible person) to correct the entire A&D Record. IOI (b)(6) also explained all requested A&D Record corrections to Ms. Reel, but Ms. Reel did not complete all of the requested corrections. Ms. Reel provided IOI (b)(6) with a final copy of the A&D Record, which she stated had all of the corrections completed. When IOI (b)(6) reviewed the A&D Record to verify the corrections, all requested corrections were not completed. Due to the compliance inspection lasting from March 18, 2021 to July 22, 2021, IOI (b)(6) did not attempt to make any more requests of Ms. Reel to correct the A&D Record. IOI (b)(6) recorded in the Report of Violations that the licensee was notified of the requested corrections for the A&D Record.

There were no illegal firearms, or obliterated serial numbers discovered. There were (b)(3)(112 Public Law 55 125 Stat 552) ATF Forms 4473 compared to the A&D book. There were discrepancies with firearms not recorded on the ATF Forms 4473 (See ATF Report of Violations). The licensee did not have, or request any variances. The licensee does not store firearms off-site.

The licensee manages the ATF forms 4473 with the Axis computerized system. The licensee had (b)(3)(112 Public Law 55 125 Stat 552) ATF Forms 4473 in the last 12 months. The licensee had ATF Forms 4473 discrepancies (See the ATF Report of Violations), The licensee had (b)(3)(112 Public Law 55 125 Stat 552) denied ATF Forms 4473 in the last year. Not all firearms transfers to other licensees were recorded properly. The sales to law enforcement were properly documented. The ATF Forms 4473 were filed chronologically. There were no manufacturing, or importing activities discovered during the compliance inspection.

A background check was completed on the following ATF Forms 4473 (See ATF Report of Violations). According to the Omnixx Forece/NCIC, there were no prohibiting factors on the the following individuals.

ATF Form 4473 question (21a), "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A)?" is Blank.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

ATF Form 4473 question (11a), "Are you the actual transferee/buyer of the firearm(s) listed on this form?" is Blank.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

ATF Form 4473 question (11d), "Are you a fugitive from justice?" is Blank.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

ATF Form 4473 question (12a) country of citizenship is blank.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

ATF Form 4473 , No NICS Check for GCA firearms.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

Failure to execute an ATF Form 4473 on 04/04/2020 (19a NICS initiated) before firearm transferred on 4/19/2020.

(b)(6)

A background check was completed on the following ATF Form 4473 (See ATF Report of Violations).

(b)(6) Illegal Firearm Sale to a Nonimmigrant who does not fall within any of the exceptions stated in the instructions.

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

A background check was completed on (b)(6) According to Omnixx Force/NCIC I.C.E. records indicate that this subject is not legally in the United States and appears to be subject to removal. (b)(6)

(b)(7)(C), (b)(6)

During the compliance inspection correction session for the ATF Forms 4473, Ms. Reel (Responsible Person) stated she contacted (b)(6) and he verified he does not fall within any of the exceptions for a nonimmigrant alien to purchase a firearm. Ms. Reel stated she understood the exception for the Nonimmigrant Alien Prohibition (ex. valid hunting license) was supposed to be obtained from (b)(6) and she does not know why the exception was not obtained. Ms. Reel did not state she made an attempt to have Mr. (b)(6) return the firearm.

According to the FFL Audit Log, the licensee had 309 NICS NTNs (preceed, delayed and open), which were reconciled with ATF Forms 4473. According to the FFL Audit Log, the

licensee had 43 denied NICS NTN's in the last five years.

According to the Violent Crime Analysis Branch (VCAB), the licensee had [redacted] traces in the last 12 months. [redacted] of the traces are [redacted] traces were traced to individuals, according to the ATF Forms 4473. IOI [redacted] emailed the VCAB requesting the individuals information be added to the following firearms on the VCAB firearms trace history.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

According to the VCAB, the licensee had [redacted] multiple sales in the last year. The licensee had [redacted] unreported multiple sales (See Report of Violations).

When the firearms compliance inspection began, IOI [redacted] informed Ms. Reel (responsible person) that all ATF records are to remain the same, without any corrections from 3/18/2021 until the end of the compliance inspection, unless permission for corrections is granted by IOI [redacted]. During the review of the ATF Forms 4473, IOI [redacted] observed unreported multiple sale forms, signed by Ms. Reel, with completion dates, which were during the compliance inspection.

IOI [redacted] queried ATFOnline eTrace to verify the dates the multiple sales forms were entered by ATF. According to the ATFOnline eTrace, multiple sales forms for previously unreported transactions were entered by ATF on [redacted] (b)(3) (112 Public Law 55 125 Stat 552) . The forms were signed by Ms. Reel during the review of the ATF Forms 4473 and during the firearms compliance inspection. IOI [redacted] asked Ms. Reel why are there multiple sale forms with her signature, which have completion dates that are during the compliance inspection and completed before she received permission to correct the multiple sale forms. Ms. Reel stated she did not sign the multiple sales forms and her employees must have signed her name on the multiple sale forms.

During the multiple sale forms correction session led by IOI [redacted], there were unreported multiple sale forms entered by ATF on May 27, 2021 in accordance with IOI [redacted] granting permission to create, correct and submit multiple forms.

IOI [redacted] verified all unreported multiple sales forms were entered by ATF and recorded on ATFOnline eTrace.

(b)(3)(26 USC § 6103)

During the firearms compliance inspection, IOI [redacted] informed Supervisor [redacted] (b)(6) about Ms. Reel's demeanor, which appeared to be uncooperative, confrontational and dismissive.

During the firearms compliance inspection, Ms. Reel's demeanor appeared to be uncooperative, confrontational and dismissive for the following reasons.

- Ms. Reel did not rectify the missing firearms inventory immediately, as requested. IOI [redacted] emailed and shared the missing firearms list with Ms. Reel on March 30, 2021. Ms. Reel intermittently provided IOI [redacted] with ATF Forms 4473 and missing firearms from March 30, 2021 to July 22, 2021.
- Ms. Reel continuously informed IOI [redacted] that she did not have time to look for the missing firearms because she had store managers and employees not working daily and needed to assist the customers.
- Ms. Reel worked the sales floor daily while IOI [redacted] was present during the compliance inspection and approached IOI [redacted] with comments and questions about the firearms compliance inspection when IOI [redacted] was attempting to leave the premises at the end of the day.
- Throughout the compliance inspection, Ms. Reel would state she is going to find the missing firearms by the requested dates provided by IOI [redacted], but when the dates arrived, Ms. Reel would inform IOI [redacted] that her employees did not find the missing firearms.
- When Ms. Reel was informed that a theft/loss form would have to be completed for the missing firearms. Ms. Reel stated she is fine with submitting a missing firearms theft/loss report because she has submitted a missing firearms theft/loss report for the other Spring Guns and Ammo stores in the past.
- Ms. Reel continuously expressed her dissatisfaction with the firearms compliance inspection by voicing loudly that she was unhappy and upset with the findings revealed during firearms compliance inspection.
- Ms. Reel continuously expressed her disagreement with the ATF Forms 4473, which were set aside with notes for the violations review at the end of the compliance inspection, even though IOI [redacted] assured her the ATF forms 4473 would be reviewed with her. Ms. Reel stated she needed to look through the ATF Forms that were set aside to find ATF Forms 4473 for missing firearms inventory.
- Ms. Reel re-arranged the ATF Forms 4473 that were set aside for the violations review and put the ATF Forms 4473 in the format she desired, after IOI [redacted] requested the ATF Forms 4473 stay in the separated stacks format IOI [redacted] put them in. Ms. Reel stated she was looking at the ATF Forms to find missing firearms.
- Ms. Reel completed A&D Records corrections she selected, submitted unreported multiple sales to ATF and corrected ATF Forms 4473 documentation according to her desired outcome instead of according to IOI [redacted] requested changes and guidance for the compliance inspection.
- When Ms. Reel was asked to provide evidence of found missing firearms, Ms. Reel provided her statements instead of evidence and expressed her disagreement in an elevated short tempered voice when her statements were not accepted.
- When Ms. Reel was informed evidence of submitted unreported multiple sales is required and the requirements for submitting multiple sales, Ms. Reel expressed her disagreement in an elevated short tempered voice.
- When IOI [redacted] informed Ms. Reel about missing ATF Form 4473 for the ATF reports and requested she assist with finding them, Ms. Reel responded by saying the forms are already there, she provided the forms and there is no need for her to search for the forms.
- Ms. Reel provided information for rectifying discrepancies in the compliance inspection according to her desired time frame, not IOI [redacted] requested time frame.

Due to Ms. Reel not providing all the requested information and all missing firearms during the requested time frames to rectify the firearms inventory and other ATF reports timely, IOI [redacted] Supervisor [redacted] (b)(6), IOI [redacted] (b)(6), IOI [redacted] (b)(6) and IOI [redacted] (b)(6) searched through ATF Forms 4473 files and located over half of the ATF Forms 4473 for the missing firearms and ATF Forms 4473 for the VCAB report.

On December 7, 2021, the ROV violation #15, 27 CFR 478.128(c) False statement made by a licensee on any ATF record was added. The licensee appears to have falsely recorded [redacted] (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) according to the A&D Record and multiple handgun sales form.

On December 14, 2021, Ms. Reel informed IOI [redacted] (b)(6) via telephone, that she and the other responsible persons for the FFL do not agree with the word deceptive being included in the violation. Ms. Reel stated they believe the word deceptive means the violation was completed intentionally. Ms. Reel stated the violation was not completed with intent.

On December 14, 2021, Ms. Reel and Mr. Ryan Skar (Responsible Person) both informed Supervisor [redacted] (b)(6) via telephone, that they disagree with the word deceptive being included in the violation and the violation was not completed with intent.

On December 14, 2021, Mr. C. David Rhodes (Responsible Person) emailed IOI [redacted] (b)(6) a response to the violation, which stated even though many mistakes are present on this Form 4473 and occurred during the course of this transaction, he does not believe that any of them were deliberate, or done to willfully obstruct information, or to knowingly bypass the proper steps required to make a legal firearm transfer from the FFL to the customer. The email is attached.

On December 14, 2021, Mr. Rhodes emailed a receipt, which records the [redacted] (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) . The receipt is attached.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

On December 14, 2021, Mr. Rhodes also emailed the following documents, which records the [redacted] (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) .

Non-NFA Bound Book Sold Disposition Dates, which records the firearm [redacted] (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) . Mr. Rhodes email stated the Extar, [redacted] (b)(6) has not properly disposed of on 4/17/2020, due to SGA Crosby, LLC software issue causes a firearm to show a "sold" date, but does not dispose the firearm as it should. Mr. Rhodes email also stated it appears that someone caught that issue and disposed the firearm on the 19th, but did not correct the disposition date to reflect the actual transfer date of the

firearm, which was the 17th.

Transactions for (b)(6) which records the payment for the above four firearms on the receipt.

On January 20, 2022, the ROV violation #15, 27 CFR 478.128(c): False statement made by a licensee on any ATF record was revised to document the information from (b)(6) receipt and Firearms Transactions document (b)(6) receipt and Firearms Transaction document were added as an attachment to the violation.

On February 14, 2022, the ROV violation #15, 27 CFR 478.128(c): False statement made by a licensee on any ATF record was changed to violation #16, 27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping.

Attachment(s)

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 7 Number of Instances: 7</p>	<p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p>	<p>NICS Violation NICS Violation NICS Violation NICS Violation NICS Violation NICS Violation NICS Violation</p> <p style="text-align: center; font-size: 2em;">(b)(6)</p>
<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p> <p>ATF Forms 4473: [redacted] Number of Instances: [redacted]</p>	<p>Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.</p>	<p style="text-align: center; font-size: 1.2em;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>18 U.S.C. 923(g)(5)(A): Failure to report multiple sales or other dispositions of certain rifles</p> <p>ATF Forms 4473: [redacted] Number of Instances: [redacted]</p>	<p>Complete and submit ATF Form 3310.12 (Report of Multiple Sale or Other Disposition of Certain Rifles) by close of the same business day, for all applicable future multiple sales.</p>	<p style="text-align: center; font-size: 1.2em;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

		(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
4	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)
5	<p>27 CFR 478.129(b): Failure to retain ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: []</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances: []</p>	<p>Accurately, completely & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473

ATF Forms 4473
Number of Instances:

Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.
Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

7

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

27 CFR 478.21(a): Failure to complete forms as prescribed

Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.

ATF Forms 4473
Number of Instances:

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

8

27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473

Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.

ATF Forms 4473
Number of Instances:

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

9

27 CFR 478.99(c): Unlawful sale or delivery of a firearm to a prohibited person

Cease and desist all firearm transfers to a known prohibited person and/or any person having reasonable cause to believe is prohibited.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

<p>10</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances <input type="text"/></p>		
<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances <input type="text"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<div style="border: 1px dashed black; padding: 20px; text-align: center;"> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> </div>
<p>12</p> <p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<div style="border: 1px dashed black; padding: 20px; text-align: center;"> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> </div>
<p>27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances <input type="text"/></p>	<p>Ensure that all required firearm identification information is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p>	<div style="border: 1px dashed black; padding: 20px; text-align: center;"> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> </div>

13

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

14

27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473

Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.

ATF Forms 4473
Number of Instances

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

15

27 CFR 478.128(c): False statement made by a licensee on any ATF record

Cease and desist from engaging in deceptive practices.

Number of Instances: 0

16

27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping

Cease and desist from engaging in deceptive practices.

Number of Instances

The violation was changed from 27 CFR 478.128(c) to 27 CFR 478.121(c).

The licensee will be notified of the violation change from 27 CFR 478.128(c) to 27 CFR 478.121(c) when the Notice is sent to the licensee.

The licensee appears to have falsely recorded **(b)(3) (112 Public Law 55 125 Stat 552)**

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

The licensee failed to execute an ATF Form 4473 for firearms transferred on

According to the A&D Record, the **(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)**

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

According to the ATF Form 4473 background check information (Item 19a, 19b, and 19c), the NCIC background check was completed on 4/4/2020 before the customer's certification date. The licensee received a "Proceed" response for the NICS background check on 4/8/2020.

The licensee failed to complete a NICS background check on 4/17/2020 for the three firearms.

(b)(3) (112 Public Law 55 125 Stat 552)

(b)(3) (112 Public Law 55 125 Stat 552)

According to the Spring Guns & Ammo (b)(6) receipt, completed by Ms. Randi Reel (Responsible Person) on 4/17/2020, the three firearms were sold to (b)(6) (b)(6) 4/17/2020.

The Transactions for (b)(6) confirms the Spring Guns & Ammo (b)(6) receipt and the sale of the three firearms (b)(6) Jr., on 4/17/2020.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

THEFT/LOSS REPORT

Acquisition Date	Type	Manufacturer	Importer	Model	Caliber/Gauge	Serial Number
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)						

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 7 Number of Instances: 7	Execute a required NICS/POC background check for all future over-the-counter firearm transactions.	Ms. Reel stated the violation happened due to lack of training of employees with regard to (b)(3)(26 USC § 6103) transfers in relation to GCA transfers. Ms. Reel stated there will be additional training provided to the staff.	Status Correction Verified Verified Method In Person Date Correction Verified 07/22/2021
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473: [redacted] Number of Instances: [redacted]	Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.	Ms. Reel stated the violation happened due to oversight. Ms. Reel stated there will be processes implemented for daily reporting of multiple sales.	Status Correction Verified Verified Method In Person Date Correction Verified 07/22/2021
18 U.S.C. 923(g)(5)(A): Failure to report multiple sales or other dispositions of certain rifles ATF Forms 4473: [redacted] Number of Instances: [redacted]	Complete and submit ATF Form 3310.12 (Report of Multiple Sale or Other Disposition of Certain Rifles) by close of the same business day, for all applicable future multiple sales.	Ms. Reel stated the violation happened due to oversight. Ms. Reel stated there will be processes implemented for daily reporting of multiple sales.	Status Correction Verified Verified Method In Person Date Correction Verified 07/22/2021
(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)

4	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)	(b)(3)(26 USC § 6103)
5	<p>27 CFR 478.129(b): Failure to retain ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Organize and maintain ATF Forms 4473 in alphabetical, chronological, or numerical order where NICS was contacted, but no firearm transfer took place, for a period not less than 5 years.</p>	<p>Ms. Reel stated she does not know how the violation happened. Ms. Reel stated the employees were not aware of the requirements to maintain records. Ms. Reel stated the employees will be trained on the requirements to maintain the forms.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
6	<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances: <input type="text"/></p>	<p>Accurately, completely & timely record all required future firearm acquisition information. Accurately, completely & timely record all required future firearm disposition information.</p>	<p>Ms. Reel stated the violation happened due to reliance on the old system Celarant and not looking directly at the firearm for the descriptive information. Ms. Reel stated not taking the steps to ensure timely dispositions. Ms. Reel stated there will be training on acquisitions, firearms descriptive information and accurate dispositions of the firearms.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 07/22/2021</p>
7	<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
8	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
9	<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
10	<p>27 CFR 478.99(c): Unlawful sale or delivery of a firearm to a prohibited person</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Cease and desist all firearm transfers to a known prohibited person and/or any person having reasonable cause to believe is prohibited.</p>	<p>Mr. Reel stated the violation happened due to oversight by former employee with regard to exception requirements to immigration status. Ms. Reel stated the staff now knows any immigration statuses have to be handled by the managers who are properly trained on requirements for exceptions to immigration statuses.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>

11	<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
12	<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
13	<p>27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required firearm identification information is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
14	<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>Ms. Reel stated the violation happened due to oversight by the staff at the time of sale. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 07/22/2021</p>
15	<p>27 CFR 478.128(c): False statement made by a licensee on any ATF record</p> <p>Number of Instances: 0</p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>Ms. Reel stated the violation happened due to an error in record keeping. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified 12/13/2021</p>
16	<p>27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping</p> <p>Number of Instances: <input type="text"/></p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>The licensee provided this response to the violation 27 CFR 478.128(c) on 12/7/2021.</p> <p>Ms. Reel stated the violation happened due to an error in record keeping. Ms. Reel stated additional ATF Form 4473 training will be provided to the staff and require a second check of the ATF Forms 4473 before the customers leave.</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified 12/07/2021</p>

CLOSING CONFERENCE

(7/22/2021)

07/22/2021

Attachment(s)

Attendee(s)

RANDILYNN CARI REEL

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 5-76-05566 Inspection Results
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
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Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
UpdateLicensingCenter	Final Signed 8C FCI-24615 SGA Crosby,.pdf
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
UpdateLicensingCenter	Final Signed 8C Houston FCI-24615 SGA Crosby, LLC dba Spring Guns & Ammo - Crosby.pdf
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
Correspondence	Spartan Notification RE: 5-76-05566 Monitored Case
ReturnedSignedROV	Report of Violations (2-14-2022).pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Harris County Zoning Letter 2022.pdf
ReturnedSignedROV	Report of Violations (1-21-2022).pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
OnSiteSummaryInformation	SGA-Crosby, LLC C. David Rhodes (RP) Response to ROV Violation False Information Email.pdf
OnSiteSummaryInformation	(b)(6) Receipt 4.17.20.pdf
OnSiteSummaryInformation	(b)(6) Firearms Transaction April 2020 (1).JPG
OnSiteSummaryInformation	(b)(6) Firearms Sold.Disp Dates.JPG
ReturnedSignedROV	Report of Violations (12-14-2021).pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ReturnedSignedROV	Report of Violations (10-18-2021).pdf
Correspondence	

Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
Correspondence	Spartan Notification RE: 5-76-05566 Special Attention Flag (SAF)
Correspondence	Spartan Notification RE: 5-76-05566 Special Attention Flag (SAF)
OnSiteSummaryInformation	ATF Request for (b)(6) Confirmation of Immigration Status.pdf
BusinessVerification	FLS.pdf
BusinessVerification	ATF Notice of Change of Control.pdf
BusinessVerification	FLS 9-28-2021.pdf
BusinessVerification	SGA Crosby, LLC Ownership.pdf
OnSiteSummaryInformation	VCAB 57605566.docx
OnSiteSummaryInformation	FFL Audit Log.xlsx
OnSiteSummaryInformation	FLS.pdf
OnSiteSummaryInformation	(b)(3) (112 Public Law 55 125 Stat 552)
OnSiteSummaryInformation	Theft Loss Report Revised 7.22.21.pdf
RentalLeaseVerification	Lease Agreement.pdf
PropertyOwnershipVerification	Harris County Appraisal District (Lake Houston Sporting Industries Inc).pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
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Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
TradeNameVerification	SOS Assumed Name Certificate.pdf
TradeNameVerification	SOS Assumed Name Certificate Query.pdf
BusinessVerification	SOS Certificate of Formation.pdf
BusinessVerification	Franchise Search Results.pdf
BusinessVerification	SOS Management.pdf
BusinessVerification	Sales Tax.pdf

License

Category	Attachment Name
Correspondence	Spartan Notification RE: 5-76-05566 Special Attention Flag (SAF)

SAR-1199

Category	Attachment Name
Correspondence	Industry Operations Report of Suspicious Activity(SAR-1199)

SAR-1330

Category	Attachment Name
Correspondence	Industry Operations Report of Suspicious Activity(SAR-1330)

Notice to Revoke or Suspend License and/or Impose a Civil Fine

In the matter of License Number 5-76-201-01-3E-05566, as a/an

Dealer in Firearms Other than Destructive Devices issued to:

Name and Address of Licensee (Show number, street, city, State and ZIP Code)

SGA Crosby LLC
d.b.a.Spring Guns & Ammo
4405 Spring Cypress Rd, Ste.200
Spring, Texas 77388 (Harris County)

Notice Is Hereby Given That:

Pursuant to the statutory provisions and reasons stated in the attached page(s), the Director or his/her designee, Bureau of Alcohol, Tobacco, Firearms and Explosives, intends to take action on the license described above.

- The above identified license may be revoked pursuant to 18 U.S.C. 923(e), 922(t)(5) or 924(p).
- The above identified license may be suspended pursuant to 18 U.S.C. 922(t)(5) or 924(p).
- The above identified licensee may be fined pursuant to 18 U.S.C. 922(t)(5) or 924(p).

Pursuant to U.S.C. 923(f)(2) and/or 922(t)(5), you may file a request with the Director of Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives, at 5825 North Sam Houston Parkway West, Suite 300, Houston, TX 77086, in duplicate, for a hearing to review the revocation, suspension and/or fine of your license. The request must be received at the above address within 15 days of your receipt of this notice. Where a timely request for a hearing is made, the license shall remain in effect pending the outcome of the hearing; and if the license is due to expire, the license will remain in effect provided a timely application for renewal is also filed. The hearing will be held as provided in 27 CFR Part 478.

If you do not request a hearing, or your request for a hearing is not received by ATF on time, a final notice of revocation, suspension, and/or imposition of civil fine (ATF Form 5300.13) shall be issued.

- Please see included brochure

Date	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official	Signature
06/14/2022	Tanarra James, Director of Industry Operations	(b)(6)

I certify that on the date shown below I served the above notice on the person identified below by:

- Certified mail to the address shown below.
Tracking Number: 7014120000001424772 Or Delivering a copy of the notice to the address shown below.

Date Notice Served	Title of Person Serving Notice	Signature
	Executive Assistant	(b)(6)

Print Name and Title of Person Served _____ Signature of Person Served (if applicable) _____

Address Where Notice Served
4405 Spring Cypress Rd, Ste. 200, Spring, Texas 77388 (Harris County)

Under the provisions of 18 U.S.C. § 923(e) and 27 CFR § 478.73, notice is hereby given that the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") intends to revoke the Federal firearms license held by SGA Crosby, LLC d.b.a. Spring Guns & Ammo - Crosby ("Licensee"), a Dealer in Firearms Other Than Destructive Devices. Specifically, the Director, Industry Operations, United States Department of Justice, ATF, Houston Field Division, has reason to believe that Licensee willfully violated the provisions of the Gun Control Act of 1968, as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 CFR Part 478 (collectively, "GCA") as described herein.

Compliance History

ATF first issued a Federal firearms license to Licensee in April 2017. The laws and regulations issued under the GCA were reviewed as part of the application inspection.

Current Inspection

On March 18, 2021, ATF IOI (b)(6) began a compliance inspection of Licensee's premises that revealed the following:

Transfer in Violation of Law:

1. On [] occasion, Licensee willfully sold or disposed of a firearm to a person who Licensee knew or had reasonable cause to believe was subject to Federal firearms disabilities, in violation of 18 U.S.C. § 922(d) and 27 C.F.R. § 478.99(c). See Appendix, ¶ 1.

False Statement in Records

2. On [] occasion, Licensee willfully and knowingly made a false entry in, failed to make appropriate entry in, or failed to properly maintain, any required record, in violation of 18 U.S.C. § 922(m) and 27 C.F.R. § 478.121(c). See Appendix, ¶ 2.

Background Check Violations

3. On seven occasions, Licensee willfully transferred a firearm to an unlicensed person without first contacting the National Instant Criminal Background Check System ("NICS") and obtaining a unique identification number and/or waiting three days before allowing the transfer, in violation of 18 U.S.C. § 922(t) and 27 C.F.R. § 478.102. See Appendix ¶ 3.

Failure to Report Multiple Sales

4. On [] occasions, Licensee willfully failed to timely and/or accurately report the sale or other disposition of two or more pistols and/or revolvers during any five

consecutive business days to an unlicensed person, in violation of 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a. See Appendix ¶ 4.

5. On occasions, Licensee willfully failed to timely and/or accurately report the sale or other disposition of two or more semiautomatic rifles in violation of 18 U.S.C. § 923(g)(5)(A) and 27 C.F.R. § 478.126. See Appendix ¶ 5.

Failure to Retain Records

6. On occasions, Licensee willfully failed to retain each Firearms Transaction Record, ATF Form 4473 for a period of not less than 5 years after the date of the NICS inquiry, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.129(b). See Appendix ¶ 6.

Acquisition and Disposition Record Violations:

7. On occasions, Licensee willfully failed to timely, completely and/or accurately record the acquisition of firearms, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.125(e). See Appendix ¶ 7.
8. On occasions, Licensee willfully failed to timely, completely and/or accurately record the disposition of firearms, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.125(e). See Appendix ¶ 8.

ATF Form 4473 Violations:

9. On occasions occurring on forms, Licensee willfully failed to obtain a complete and/or accurate Firearms Transaction Record, ATF Form 4473, from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(1). See Appendix ¶ 9.
10. On occasions occurring on forms, Licensee willfully failed to obtain/execute the Firearms Transaction Record, ATF Form 4473 as indicated by the headings on the Form and the instructions on or pertaining to the Form, in violation of 18 U.S.C. § 922(m) and 27 CFR § 478.21(a). See Appendix ¶ 10.
11. On occasions, Licensee willfully transferred a firearm to a non-licensee without verifying the identity of the transferee by examining the identification document presented and noting the type on a Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(3)(i). See Appendix ¶ 11.
12. On occasions occurring on forms, Licensee willfully transferred a firearm to a non-licensee without recording the date the Licensee contacted the National Instant

Criminal Background Check System (“NICS”), any response provided by the system and/or any identification number provided by the system information on the Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(3)(iv). See Appendix ¶ 12.

13. On occasion, Licensee willfully sold or otherwise disposed of a firearm to an unlicensed person without recording the transaction on a Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(a). See Appendix ¶ 13.
14. On occasions occurring on forms, Licensee willfully failed to completely and/or accurately identify the firearm to be transferred on the Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(4). See Appendix ¶ 14.
15. On occasions occurring on five forms, Licensee willfully failed to sign and/or date the Firearms Transaction Record, ATF Form 4473 certifying that Licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(5). See Appendix ¶ 15.

APPENDIX

Paragraph 1

27 CFR § 478.99(c) - Unlawful sale or delivery of a firearm to a prohibited person.

Date	ATF Form 4473	Form Item	Firearm Transferred
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)			

Paragraph 2

27 CFR § 478.121(c) - Making false entry, omitting entry, or failing to properly maintain required recordkeeping.

Date	ATF Form 4473	Form Item Number & Discrepancy
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)		

Paragraph 3

27 CFR § 478.102(a) - Failure to complete a background check.

#	Date of Transfer	Transferee	Firearm
1.	2/12/21	(b)(6)	
2.	5/29/20		
3.	9/16/20		
4.	10/21/20		
5.	10/9/20		
6.	10/29/20		
7.	4/17/20		

Paragraph 4

27 CFR § 478.126a - Failure to report multiple sales or other dispositions of pistols and revolvers.

#	Date	ATF Form 4473	Discrepancy Firearms Not Included
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 5

18 U.S.C. 923(g)(5)(A) - Failure to report multiple sales or other dispositions of certain rifles.

#	Date	ATF Form 4473	Discrepancy Firearms Not Included
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)			

Paragraph 6

27 CFR § 478.129(b) – Failure to retain ATF Forms 4473.

#	Date	NICS NTN	DISCREPANCY
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)			

Paragraph 7

27 CFR § 478.125(e) – Failure to maintain an accurate/complete/timely acquisition record of firearms.

#	Date	FIREARM	DISCREPANCY
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 8

27 CFR § 478.125(e) – Failure to maintain an accurate/complete/timely disposition record of firearms.

#	Date	FIREARMS	DISCREPANCY
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 9

27 CFR § 478.124(c)(1) - Failure to obtain a completed ATF Form 4473.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 10

27 CFR § 478.21(a) - Failure to complete forms as prescribed.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 11

27 CFR § 478.124(c)(3)(i) - Failure to verify or record Identification document on ATF Form 4473.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 12

27 CFR § 478.124(c)(3)(iv) - Failure to record NICS contact information on an ATF Form 4473.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(6),(b)(7)(C)

Paragraph 13

27 CFR §478.124(a) - Failure to execute an ATF Form 4473

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 14

27 CFR § 478.124(c)(4) - Failure to record firearm information on an ATF Form 4473.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 15

27 CFR § 478.124(c)(5) - Failure by transferor to sign and/or date an ATF Form 4473.

#	Date	ATF Form 4473	Form Item Number & Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Voluntary Surrender of Federal Firearms License

SGA Crosby LLC (“SGA”) holds Federal firearms license number 5-76-201-01-3E-05566, as a Dealer in Firearms Other Than Destructive Devices, issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) pursuant to the Gun Control Act of 1968 (GCA), as amended, 18 U.S.C. Chapter 44.

On June 14, 2022, ATF issued a Notice to Revoke or Suspend License and/or Impose a Civil Fine (Notice to Revoke) to SGA Crosby LLC. By letter dated June 29, 2022, SGA Crosby LLC timely requested a hearing on the Notice to Revoke. Pursuant to that request, ATF scheduled a hearing to occur September 8, 2022.

SGA does, effective September 30, 2022, hereby voluntarily surrender its Federal firearms license and withdraw its request for a hearing on the Notice to Revoke.

(b)(3)(26 USC § 6103)

We further understand that SGA may no longer lawfully engage in the business of dealing in firearms after the surrender of its Federal firearms license.

SGA also agrees to deliver its original Federal firearms license and the records it is required to keep under the GCA to ATF within 30 days of the surrender of its license per *18 U.S.C. § 923(g)(4); 27 C.F.R. § 478.57(a)*. SGA acknowledges that failure to turn in such records is punishable by a fine of not more than \$250,000 and/or imprisonment for term of not

more than five years. SGA further understands that if it, as an entity, conducts business as a firearms dealer after surrendering the license pursuant to this Agreement, would violate *18 U.S.C. § 922(a)(1)(A)*, which is also punishable by a fine of not more than \$250,000 and/or imprisonment for not more than five years.

Therefore, SGA hereby surrenders its Federal firearms license effective September 30, 2022, and make the above statements knowingly, voluntarily, and intelligently. The undersigned affirms that he is authorized to effectuate the surrender of the license issued to SGA, and understand that any false statements or representations contained in this document may result in me being criminally prosecuted under *18 U.S.C. § 1001*. The above statements are made without having been threatened or pressured to do so by any person and without having received any promises of favorable treatment.

(b)(6) 08/31/2022
Signature / Date
For SGA Crosby LLC

Christopher David Rhodes (Jr.)
Printed Name

(b)(6) 09/01/2022
Signature / Date
For SGA Crosby LLC

Ryan Skar
Printed Name

(b)(6) 08/31/2022
Signature / Date
For SGA Crosby LLC

Randilynn Reel
Printed Name

(b)(6) 08/31/2022
Signature / Date
For SGA Crosby LLC

Christopher Rhodes
Printed Name

DATED: August 31, 2022

**Final Notice of Denial of Application, Revocation
Suspension and/or Fine of Firearms License**

In the matter of:

- The application for license as a/an _____, filed by:
or
 License Number 5-76-201-01-3E-05566 as a/an
Dealer in Firearms Other Than Destructive Devices, issued to:

Name and Address of Applicant or Licensee (Show number, street, city, state and Zip Code)
SGA Crosby LLC
5911 FM 2100
Crosby, Texas 77532

Notice is Hereby Given That:

- A request for hearing pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(5) was not timely filed. Based on the findings set forth in the attached document, your
 license described above is revoked pursuant to 18 U.S.C., 923(e), 922(t)(5) or 924(p), effective:
 15 calendar days after receipt of this notice, or September 30, 2022,
 license is suspended for _____ calendar days, effective _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
 licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
- After due consideration following a hearing held pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(5), and on the basis of findings set out in the attached copy of the findings and conclusions, the Director or his/her designee concludes that your
 application for license described above is denied, pursuant to 18 U.S.C., 923(d).
 application for renewal of license described above is denied pursuant to 18 U.S.C. 923(d), effective:
 15 calendar days after receipt of this notice, or _____
 license described above is revoked pursuant to 18 U.S.C., 923(e), 922(t)(5) or 924(p), effective:
 15 calendar days after receipt of this notice, or _____
 license is suspended for _____ calendar days, effective _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
 licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).

If, after the hearing and receipt of these findings, you are dissatisfied with this action you may, within 60 days after receipt of this notice, file a petition pursuant 18 U.S.C. § 923(f)(3), for judicial review with the U.S. District Court for the district in which you reside or have your principal place of business. If you intend to continue operations after the effective date of this action while you pursue filing for judicial review or otherwise, you must request a stay of the action from the Director of Industry Operations (DIO), Bureau of Alcohol, Tobacco, Firearms and Explosives, at 5825 North Sam Houston Parkway West, Suite 300, Houston, Texas 77086

prior to the effective date of the action set forth above. You may not continue licensed operations unless and until a stay is granted by the DIO.

Records prescribed under 27 CFR Part 478 for the license described above shall either be delivered to ATF within 30 days of the date the business is required to be discontinued or shall be documented to reflect delivery to a successor. See 18 U.S.C. 923(g)(4) and 27 CFR § 478.127.

After the effective date of a license denial of renewal, revocation, or suspension, you may not lawfully engage in the business of dealing in firearms. Any disposition of your firearms business inventory must comply with all applicable laws and regulations. Your local ATF office is able to assist you in understanding and implementing the options available to lawfully dispose of your firearms business inventory.

Date	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official	Signature
09/06/2022	Tanarra James, Director, Industry Operations	(b)(6)

I certify that, on the date below, I served the above notice on the person identified below by:

Certified mail to the address shown below.
Tracking Number: 7018 2290 0000 3367 3199

Or

Delivering a copy of the notice to
the address shown below.

Date Notice Served	Title of Person Serving Notice	Signature
	Executive Assistant	(b)(6)

Print Name and Title of Person Served

Address Where Notice Served
4405 Spring Cypress Road, Suite 200, Spring, Texas 77388

Note: Previous Edition is Obsolete

SGA Crosby, LLC, (“Licensee”), holds Federal Firearms License 5-76-201-01-3E-05566, issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) pursuant to the Gun Control Act of 1968, as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R. Part 478 (collectively, “GCA”) as described herein.

On June 14, 2022, ATF issued a Notice to Revoke or Suspend Licensee and/or Impose a Civil Fine, ATF E-Form 4500(5300.4) (“Notice to Revoke License”) advising Licensee that ATF intended to revoke its License. The Notice to Revoke alleged that Licensee willfully violated the provisions of the GCA and the regulations issued thereunder. The Notice to Revoke further specified that if Licensee wished to challenge the revocation, it may file a request with ATF for a hearing “within 15 days after receipt of this notice.” See 18 U.S.C. § 923(f)(2); 27 C.F.R. § 478.73(b).

By letter dated June 29, 2022, Licensee timely requested a hearing to review the Notice to Revoke License. As a result, ATF notified Licensee that the hearing would occur on September 8, 2022.

All four Responsible Persons for Licensee signed a Voluntary Surrender of Federal Firearms License dated August 31, 2022, indicating that Licensee was withdrawing its request for a hearing and surrendering its license.

For reasons set forth in the Notice to Revoke License issued on June 14, 2022, License for SGA Crosby LLC is hereby REVOKED with an effective date of September 30, 2022.

Dated this 6th day of September 2022

(b)(6)

Tanarra James

Director, Industry Operations

Houston Field Division

Bureau of Alcohol, Tobacco, Firearms and Explosives

United States Department of Justice